



U.S. Department of Justice

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December 23, 2025

The Honorable Lawrence J. Vilardo
United States District Judge
Robert H. Jackson United States Courthouse
2 Niagara Square
Buffalo, New York 14202

**Re: Castillo v. Freden, et al.
25-CV-01350-LJV**

Dear Judge Vilardo:

The government writes to advise the Court that ICE has already arranged for an officer to be present tomorrow, despite the federal holiday that was announced, to collect bond from Petitioner's obligor and arrange for his release. It is not the government's fault that at the eleventh hour a non-profit has become involved that cannot appear to post bond or otherwise arrange for bond payment to be submitted to ICE. The government has already expended great effort to comply with this Court's requirements, and if this Court orders Petitioner's release due to his inability to post bond—despite the accommodations made by ICE—it would be unjust. The government therefore respectfully requests that the Court not alter its current order, and require Petitioner to either post bond in person or remain in custody.

Respectfully submitted,

MICHAEL DIGIACOMO
Acting United States Attorney
Western District of New York

BY: /s/ ADAM A. KHALIL
Assistant United States Attorney